



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**RAS Citron, LLC**

Authorized Agent for Secured Creditor  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
Facsimile: 973-404-8886

Harold Kaplan (HK0226)

In Re:

**Kathleen L Baylock**

**fka Kathleen L Mason**

**fka Kathleen L Langston**

**Debtor,**

Order Filed on March 2, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Case No.: 19-23780-JNP

Chapter: 13

Hearing Date: February 4, 2020

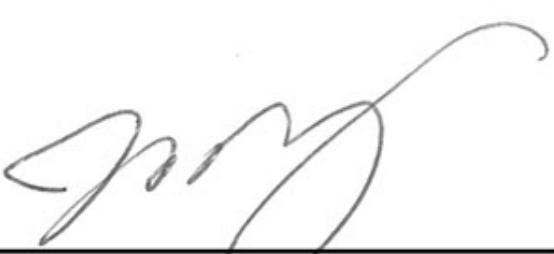
Judge: Jerrold N. Poslusny Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby

ORDERED.

**DATED: March 2, 2020**

  
Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

**Page 2**

Secured Creditor: Ditech Financial LLC

Secured Creditor's Counsel: RAS Citron, LLC

Debtors' Counsel: Mark W Ford, Esq.

Property Involved ("Collateral"): 1446 South 9th Street, Camden, New Jersey 08104

Relief sought:

- Motion for relief from the automatic stay
- Motion to dismiss
- Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 6 months from August 1<sup>st</sup>, 2019 through January 1<sup>st</sup> 2019.
- The Debtor is overdue for 6 payments from August 1<sup>st</sup>, 2019 at \$864.22 per month.

Funds Held In Suspense \$0.00.

Total Arrearages Due \$5,185.32.

2. Debtor must cure all post-petition arrearages, as follows:

- Beginning on February 1<sup>st</sup>, 2020, regular monthly mortgage payments shall continue to be made in the amount of \$864.22.
- Beginning on February 15<sup>th</sup>, 2020, monthly cure payments shall be made in the amount of \$864.22 for 6 months.

3. Payments to the Secured Creditor shall be made to the following address(es):

■ Regular monthly payment: Ditech Financial LLC  
ATTN: Bankruptcy Dept  
PO BOX 94710  
Palatine, IL 60094-4710

■ Monthly cure payment: Ditech Financial LLC  
ATTN: Bankruptcy Dept  
PO BOX 94710  
Palatine, IL 60094-4710

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

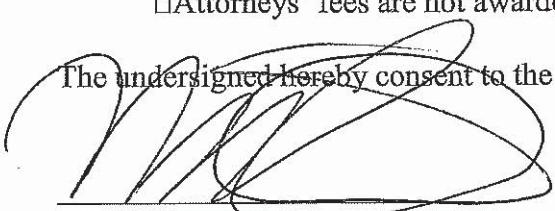
The fees and costs are payable:

■ Through the Chapter 13 plan.

To the Secured Creditor within \_\_\_\_\_ days.

Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.

  
Mark W Ford, Esq.  
*Attorney for Debtor(s)*  
Date:

/s/ Harold Kaplan

Harold Kaplan, Esq.  
*Attorney for Secured Creditor*  
Date: 3/2/2020